



✓ 42-045-00070  
PA000293037  
Erin Willard

**Monroe Energy, LLC**  
4101 Post Road  
Trainer, PA 19061  
(610) 364-8000

USPS 9405 5036 9930 0022 1206 00

September 18, 2020

Mr. James Rebarchak  
Program Manager – Bureau of Air Quality  
Pennsylvania Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

**RE: Semi-Annual Title V Deviation Report  
Monroe Energy, LLC – Trainer Refinery  
Permit No. 23-00003  
Reporting Period: 01/01/2020 – 06/30/2020**

Dear Mr. Rebarchak:

In accordance with Title V Permit number TVOP 23-00003, Condition (B)(025)(b) and Condition (C)(013)(e), the Trainer Refinery hereby submits a Title V Semi-Annual Deviation Report for the period January 1, 2020 – June 30, 2020.

Should you have any questions or comments regarding the enclosed report, please call me at (610) 364-8395.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Clapp".

Elizabeth Clapp, P.E.  
Environmental Leader

Enclosure

cc: Office of Air Enforcement and Compliance Assistance (3AP20)  
United States Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029  
USPS 9405 5036 9930 0022 1206 17

**Responsible Official Certification**

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.



September 17, 2020

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Mark Schuck,  
VP, Refinery Operations

Date



PAENSVLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY  
COMPLIANCE CERTIFICATION FORM  
(25 Pa. Code § 107.912)

Facility Name:	Monroe Energy Transfer Refinery	Owner/Operator:	Monroe Energy LLC
Tax ID/PAEN:	75-0403345-1	DEP Facility ID:	201601
Contact Person:	J. Nathan Clegg	Title:	Environmental Leader
Operating Permit #:	23-00001	Phone Number:	(814) 364-8395

For the period 1/1/2020 to 6/30/2020, Monroe Energy Transfer Refinery has been in continuous compliance with all applicable requirements of permit # 23-00001 (determined by the methods of compliance specified in said permit), except for the following deviations, excursions, and excursions:

Permit Condition	Citation	Type of Requirement	Source	Description of Deviation	Monitoring Method(s)	Start Date/Time	End Date/Time	Duration (Hours)	Corrective Action(s) Taken
(23015)(001)(A)(4)	25 Pa. Code §127.441	Restriction (Emission, Fuel, etc.)	015-Baker 10	The CO by/air calculated value exceeded the permit limit for a one hour period.	CEMS	1/1/2020 0:00	1/6/2020 14:58	206	Once the deviation was discovered, the CEMS was adjusted to get the better CO back in compliance. A root cause analysis was performed on the incident and additional program improvements and environmental operating limits are being developed to ensure future compliance.
(23015)(001)(B)(4)	25 Pa. Code 127.441	Work Practice Standard	118 - Reformulator Regenerator	The weekly average chloride concentration was 2.26 wt%. This exceedance was caused by catalyst bridging in the Chloride section of the regenerator.	Sampling	1/5/2020 0:00	1/11/2020 23:59	168	ACE inspection was reduced in the regenerator, and regenerator was shut down for one color on LCB. Chloride levels then returned to normal operations.
(23015)(001)(C)(4)	25 Pa. Code §127.441 & 40 CFR Part 63 Subpart VCAA	Restriction (Emission, Fuel, etc.)	102 - Claus Sulfur Recovery Plant	12 Hour Average SO <sub>2</sub> Averaged = 250 ppm	CEMS	2/22/2020 11:00	2/22/2020 23:59	13	Upset Conditions were corrected.
8-3004	25 Pa. Code 123.22(a)(1), 127.512, and 40 CFR 60.304	CEMS	Site	Odor complaint from outside the fence line.	Visual Inspection	6/14/2020 17:53	6/14/2020 18:11	<1	Drawing activity was stopped. Water spray was used to knock down vapors from the drawing operation. The odor dissipated shortly thereafter. As an interim measure, the procedure for drawing of material has been modified to reduce the potential for odor from the activity.
(23015)(001)(D)(4)	25 Pa. Code 127.441 & 127.442	Work Practice Standard	106 - Process Drains & H2O Separator	API Separator had oil on the roof during environmental inspections.	Visual Inspection	1/21/2020 9:00 6/30/2020 9:00	1/21/2020 10:00 6/30/2020 10:00	2	Any liquid oil that was discovered was cleaned up during the work shift.

The Refinery is part of a Consent Decree (Consent Decree) between the Commonwealth of Pennsylvania and the Environmental Protection Agency (EPA) regarding the 1992 Consent Decree. The Refinery is subject to the terms of the Consent Decree, which requires the Refinery to maintain certain levels of emissions and to implement certain measures to reduce emissions. The Refinery is also subject to the terms of the 1992 Consent Decree, which requires the Refinery to maintain certain levels of emissions and to implement certain measures to reduce emissions. The Refinery is also subject to the terms of the 1992 Consent Decree, which requires the Refinery to maintain certain levels of emissions and to implement certain measures to reduce emissions.



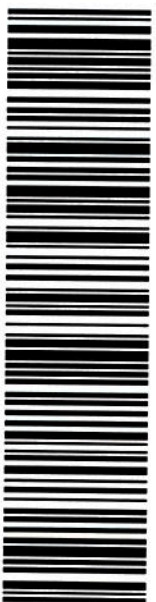
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<b>SHIP TO: JAMES REBARCHAK</b> <b>PA DEPARTMENT OF ENVIRONMENTAL PROTECTION</b> <b>2 E MAIN ST</b> <b>NORRISTOWN PA 19401-4915</b>		<b>09/10/2020</b> <b>Mailed from 19061 062S00000000310</b>	
<b>Carrier -- Leave if No Response</b> <b>C008</b>		<b>0006</b>	
<b>USPS TRACKING #</b> <b>9405 5036 9930 0022 1206 00</b> 		<b>Electronic Rate Approved #038555749</b>	

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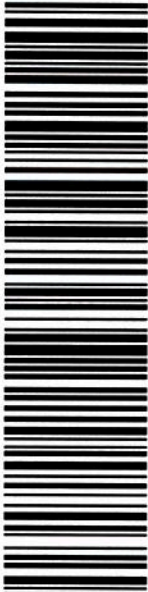
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Trans. #: 505267308 Print Date: 09/10/2020 Ship Date: 09/10/2020 Expected Delivery Date: 09/11/2020	Priority Mail® Postage: <b>\$7.75</b> Total: <b>\$7.75</b>
<b>From:</b> STEPHANIE C SCOTTON MONROE ENERGY LLC 4101 POST RD TRAINER PA 19061-5052	
<b>To:</b> JAMES REBARCHAK PA DEPARTMENT OF ENVIRONMENTAL PROTECTION 2 E MAIN ST NORRISTOWN PA 19401-4915	
<small>* Retail Pricing Priority Mail rates apply. There is no fee for USPS Tracking® service on Priority Mail service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.</small>	



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<b>STEPHANIE C SCOTTON</b> <b>MONROE ENERGY LLC</b> <b>4101 POST RD</b> <b>TRAINER PA 19061-5052</b>		<b>Expected Delivery Date: 09/11/20</b> <b>0006</b>	
<b>Carrier -- Leave if No Response</b> <span style="border: 1px solid black; padding: 2px;"><b>C001</b></span>			
<b>SHIP UNITED STATES ENVIRONMENTAL PROTECTION</b> <b>TO: OFFICE OF AIR ENFORCEMENT AND COMPLIANCE</b> <b>1650 ARCH ST</b> <b>REGION III, MAIL CODE 3AP20</b> <b>PHILADELPHIA PA 19103-2029</b>			
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<b>To:</b> UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF AIR ENFORCEMENT AND COMPLIANCE ASSISTANC 1650 ARCH ST REGION III, MAIL CODE 3AP20	
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